



LEWIS BRISBOIS BISGAARD & SMITH LLP

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August 23, 2021

File No. 50031.2179

VIA ECF

Hon. Victor Marrero
United States District Court
Southern District of New York
500 Pearl Street, Suite 1610
New York, NY 10007-1312

Re: *Rosenfield & Company, PLLC v. Trachtenberg, Rodes & Friedberg LLP et al.*
1:21-cv-03858-VM

Dear Judge Marrero:

We have been retained as the new counsel for Trachtenberg Rodes & Friedberg LLP, defendants in the above-referenced matter. We have filed a notice of appearance, together with a proposed Order for substitution of counsel on consent to effectuate the change of attorneys. We are also counsel to third-party defendants Barry Friedberg and Leonard Rodes.

We write today to respectfully request a 45 day extension, up to and including October 7, 2021, of the deadline for defendant Trachtenberg Rodes & Friedberg LLP to answer, move, or otherwise respond to the crossclaims of defendants/third-party plaintiffs Star Auto Sales of Bayside, Inc., Star Auto Sales of Queens, LLC, Star Hyundai LLC, Star Nissan, metro Chrysler Plymouth Inc., Star Auto Sales of Queens County LLC, and Star Auto Sales of Queens Village LLC (collectively “Star Defendants”). Additionally, we write to request a 45 day extension, up to and including October 7, 2021, of the deadline for third-party defendants Barry Friedberg and Leonard Rodes to respond to the third-party complaint of the Star Defendants. These requests are the first such requests made by these defendants and they are made with the consent of the Star Defendants.

This extension is necessary because we have only just been retained and we require additional time to complete transition and review the claims at issue. The additional time will permit these defendants to file a complete and accurate response to the crossclaims and third-party complaint, including the contemplation and identification of any deficiencies in these pleadings which may warrant their dismissal.

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We thank the Court for its attention to this matter.

Respectfully,

/s/ Mark Anesh

Mark K. Anesh of
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cc: All parties by ECF